

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the

United States Courts
Southern District of Texas
FILED
JUL 13 2015

United States of America)	Case No.
v.)	
OLUWASEGUN ISAAC OLUDIRAN aka)	
ISAAC LAPATO OLUDIRAN aka ISAAC OLUDIRAN)	
aka HABIB GARBA)	
)	

David J. Bradley, Clerk of Court

H15-986 M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 12/01/2014 - 07/11/2015 in the county of Harris & Ft. Bend in the
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC Sec. 1028A	Aggravated Identity Theft
18 USC Sec. 1343	Wire Fraud
18 USC Sec. 1349	Conspiracy to Commit Wire & Bank Fraud

This criminal complaint is based on these facts:

See Attached Affidavit of US Postal Inspector Matthew S. Boyden

Continued on the attached sheet.


Complainant's signature

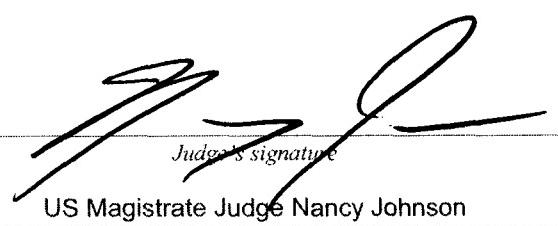
US Postal Inspector Matthew S. Boyden

Printed name and title

Sworn to before me and signed in my presence.

Date: 7-13-15

City and state: Houston, Texas


Judge's signature
US Magistrate Judge Nancy Johnson
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

1. Affiant, United States Postal Inspector Matthew S. Boyden, has been employed by the U.S. Postal Inspection Service since January 2000. Affiant is currently assigned to the Major Fraud team in Houston, Texas. Prior to that, Affiant served as a lieutenant of police for a municipal police department in Texas. Affiant has served in the U.S. Air Force as a Law Enforcement Specialist and criminal investigator for the Air Force Office of Special Investigations. Affiant has received specialized training in numerous Postal crimes, but primarily those involving "identity theft" and mail fraud related offenses. Affiant has attended training in the areas of check fraud, credit card fraud, and identity takeover schemes. Affiant has investigated hundreds of cases involving fraud, identity theft, and related "white collar" types of offenses. Affiant is authorized to obtain and execute Federal Arrest and Search Warrants. This Affidavit is made in support of a criminal complaint filed against **OLUWASEGUN ISAAC OLUDIRAN aka ISAAC LAPATO OLUDIRAN aka ISAAC OLUDIRAN aka HABIB GARBA**.
2. The information set forth in this Affidavit is based upon your Affiant's personal knowledge and/or information provided to Affiant by other law enforcement agents and officers, witnesses, bank investigators, and cooperating individuals Affiant believes to be reliable and credible. Because this Affidavit is being submitted for the limited purpose of supporting a criminal complaint, Affiant has not included each and every fact concerning this investigation. Affiant has set forth only the facts believed to establish probable cause that OLUWASEGUN ISAAC OLUDIRAN aka ISAAC LAPATO OLUDIRAN aka ISAAC OLUDIRAN aka HABIB GARBA has committed violations of federal law.
3. In May 2015, Affiant was contacted by fraud investigators at Wells Fargo Bank (WFB) regarding a large-scale fraud scheme targeting their bank and its customers. Bank investigators advised Affiant that numerous home equity line-of-credit account (HELOC) holders were having their accounts compromised and fraudulent wire transfer request forms submitted to the bank. The wire transfer forms directed the bank to wire money to accounts located throughout the United States with a significant amount being directed to accounts in Houston, Texas. The bank identified over \$1 million dollars in fraudulent activity. In addition to the fraud at WFB, Affiant learned that similar fraudulent activity was occurring at other financial institutions using the same fraudulent account information and identities. Affiant knows from training and experience that these financial institutions are insured

by the Federal Deposit Insurance Corporation. Affiant knows from training and experience that the wire transfers were interstate or affected interstate commerce.

WELLS FARGO BANK

4. Affiant learned that on or about 12/23/14, an individual (later identified as OLUDIRAN) using the name "Habib Garba" opened a bank account at Wells Fargo Bank in Houston, Texas. The account was opened by WFB employee Ana Silvia Alcaraz. The imposter presented a Ghanaian passport and used a Houston address. Affiant reviewed numerous databases and believes the passport is counterfeit. The following is a partial list of deposits or attempted deposits to the account:
 - 04/16/15 - \$60,000 wire transfer from WFB victim account #7955114850 located in Arizona
 - 04/20/15 - \$92,560 wire transfer from WFB victim account #75211508630001 located in Minnesota
 - 04/28/15 - \$475,160 wire transfer from WFB victim account #11704999351998 located in Minnesota
5. Affiant learned from WFB investigators that these wire transfers were not authorized or legitimate. The following is a list of debits from the account:
 - 04/17/15 - \$34,064.80 wire transferred to HSBC account in the name of GIV Consulting LTD (England)
 - 04/17/15 - \$20,700 wire transfer to WFB account of Temitope & Olufunke Obisanya (Houston)
 - 04/20/15 – Habib Garba made a \$4,000 over-the-counter withdrawal
 - 04/20/15 - Habib Garba made a \$30,000 over-the-counter withdrawal
 - 04/21/15 – \$20,050 wire transfer to Bank of America account in the name Fred Agbemafle (Georgia)
 - 04/21/15 - \$35,200 wire transfer to First National Bank Texas account of ISAAC OLUDIRAN
 - 04/22/15 – Habib Garba made a \$7,000 over-the-counter withdraw and purchased a cashier's check payable to Copart.
6. Affiant has obtained and reviewed bank video of the imposter which clearly depicts ISAAC OLUDIRAN as "Habib Garba". Affiant also obtained and reviewed video from transactions involving the Habib Garba debit card which clearly depict ISAAC OLUDIRAN using the card. Bank investigators interviewed Ana Alcaraz who stated she opened up the account at the request of her friend Comerica Bank employee OLUSEGUN JINADU. Several of the over-the-counter withdrawals were used to purchase cashier's checks payable to Copart. Affiant obtained records from Copart and learned that the cashier's checks were negotiated by ISAAC OLUDIRAN.

COMERICA BANK

7. Affiant learned that on or about 01/20/15, an individual (later identified as ISAAC OLUDIRAN) using the name "Habib Garba" opened a bank account at Comerica Bank (CB) in Houston, Texas. The account was opened by CB employee OLUSEGUN JINADU. The imposter using the name Habib Garba presented a Ghanaian passport and used a Houston address. Affiant has reviewed numerous databases and believes the passport is counterfeit. On or about 01/21/15, Garba deposited a \$95,500.00 check drawn on the Icon Bank account of Freedom Logistics, LLC. The check was stolen and counterfeited. The account hold was over-ridden by bank employee Olusegun Jinadu and the account depleted of the funds. Bank employee Jinadu was demoted internally for failing to follow bank rules and policies.

THE UNDERCOVER ACCOUNT

8. In addition to the aforementioned accounts, WFB investigators provided Affiant with numerous additional wire transfers to other accounts. On 05/28/15, a \$91,200.00 wire transfer was sent to the WFB account of Chunta Warfield. On 06/22/15, Affiant interviewed Warfield who stated she was recruited by her friend Lakishia Simmons to open accounts and receive money. On 06/24/15, Affiant interviewed Lakishia Simmons who stated she had a friend named Olusegun Jinadu that currently worked at Comerica Bank. He previously worked at Wells Fargo Bank. Simmons stated she was asked by Jinadu to find people willing to open accounts and receive wire transfers. She admitted recruiting Warfield and turning over her account information to Jinadu. She stated Jinadu is constantly seeking out information and accounts to be used for fraud. She stated Jinadu is involved in wire and check fraud. Simmons agreed to assist Affiant with the investigation. She was able to provide text messages confirming her story between Jinadu and her. She also agreed to record her telephone conversations with Jinadu. Affiant instructed Simmons to tell Jinadu that she could have someone open additional accounts to receive wires.
9. Jinadu told Simmons to have her contact open accounts at Comerica Bank and other banks. He emailed the personal information of victim DS to Affiant using an account that he provided. Affiant has spoken with DS who did not authorize anyone to have or use his personal identifiers. After being told by Jinadu to open accounts, Affiant provided Jinadu two profiles for undercover accounts at Comerica Bank and First National Bank Texas. Jinadu provided lengthy directions to Simmons on what was supposed to happen once a wire transfer was received. On 07/10/15, Affiant learned that a \$224,985.00 was received by Comerica Bank for the undercover account established by Affiant.

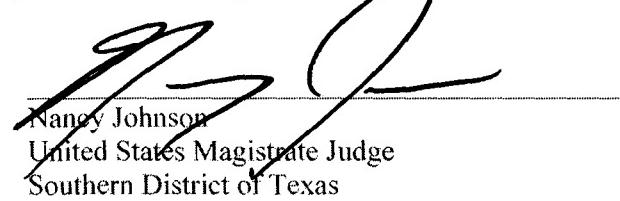
Affiant contacted fraud investigators at UMB Bank (the source bank) and learned the wire transfer was not legitimate or authorized by their customer. Affiant later learned that the funds were stolen from the victim DS.

10. Affiant learned from Comerica Bank fraud investigators that employee Jinadu continued to monitor the account throughout the day. Jinadu informed Simmons that the wire was expected. A meeting was set up between Simmons and Jinadu after he got off work on 07/10/15 to discuss withdrawing the funds. Jinadu was detained by law enforcement after leaving the bank. He was advised of his Miranda warnings both orally and in writing which he acknowledged and waived. He agreed to answer questions and to provide information. Jinadu admitted to using his position as a bank employee to facilitate and participate in numerous fraudulent scams. He stated that he had been recruited into this activity by ISAAC OLUDIRAN. He stated that everything he had done he had done with or for OLUDIRAN. He was able to provide text messages and recorded calls confirming his version of events. Jinadu also stated that OLUDIRAN was the person that opened the Habib Garba accounts. He stated that OLUDIRAN had orchestrated the \$224,985.00 wire transfer and was waiting to meet and get money from Jinadu. Jinadu agreed to assist Affiant with this investigation.
11. Affiant instructed Jinadu to advise OLUDIRAN that he was in possession of the money from the wire transfer and they agreed to meet and exchange money. On 07/11/15, OLUDIRAN was detained after meeting with Jinadu. He was advised of his Miranda rights which he acknowledged and requested an attorney. He was placed under arrest and transported by Affiant to the FDC for processing.

12. Based upon the above, the undersigned believes there is probable cause to believe that **OLUWASEGUN ISAAC OLUDIRAN aka ISAAC LAPATO OLUDIRAN aka ISAAC OLUDIRAN aka HABIB GARBA** has committed crimes in violation of Title 18, United States Code, Sections 1028A, 1343, and 1349.

M. S. T.
Matthew S. Boyden
United States Postal Inspector

Sworn and Subscribed to me this 13th day of July, 2015, and I find probable cause.


Nancy Johnson
United States Magistrate Judge
Southern District of Texas

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

OLUWASEGUN ISAAC OLUDIRAN aka
ISAAC LAPATO OLUDIRAN aka ISAAC OLUDIRAN
aka HABIB GARBA

Case No.

H15-986 M

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) OLUWASEGUN ISAAC OLUDIRAN aka ISAAC LAPATO OLUDIRAN aka ISAAC OLUDIRAN,
who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
 Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

18 USC Sec. 1028A - Aggravated Identity Theft
18 USC Sec. 1343 - Wire Fraud
18 USC Sec. 1349 - Conspiracy to Commit Wire & Bank Fraud

Date: 7-13-15

City and state: Houston, Texas


Issuing officer's signature

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date:

Arresting officer's signature

Printed name and title